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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Redevelopment of Spectrum	)	
to Encourage Innovation in	)	ET Docket No. 92-9
the Use of New	)	
Telecommunications	)	RM-7981
Technologies	)	RM-8004

TO: The Commission

COMMENTS OF THE
UTILITIES TELECOMMUNICATIONS COUNCIL
ON
THIRD NOTICE OF PROPOSED RULE MAKING

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TABLE OF CONTENTS

SUMMARY

The optimum method of expediting the introduction of emerging telecommunications services, while at the same time fulfilling the Commission's commitment to protect the operational and financial integrity of the incumbent 2 GHz microwave users, is to rely on marketplace mechanisms. The goal is to let the marketplace resolve relocation issues, but to have a mandatory relocation program in place as a "safety net" to handle any situations where the incumbent refuses to deal in good faith.

In order for such an approach to be effective, a sufficiently lengthy period of voluntary negotiations is required to allow market forces to work. By delaying the availability of mandatory relocation procedures, the Commission will encourage the parties to resolve differences voluntarily; it will stimulate the development of spectrum-sharing techniques; it will minimize the need for the Commission to intervene in what could be up to 29,000 relocation decisions; and it will allow the marketplace to establish fair compensation and reasonable relocation arrangements, which could serve as a body of experience to be applied in contested cases.

Accordingly, the Commission should promote the use of voluntary negotiations between new service providers and incumbent microwave licensees through the adoption of a "sliding

period" of negotiations, of at least five (5) years, commencing with the date each new service license is granted in any particular area. Adoption of a 5-year sliding negotiation period would ensure that the transition framework adopted in the First R&O is applied to all segments of the 2 GHz band equally, and that the obligation to negotiate in good faith would apply equally to all new users of the 2 GHz band.

Further, the Commission should not attempt to specifically define "comparable alternative facilities" but instead should allow parties to individually identify and negotiate the factors that each microwave licensee considers important to an assessment of "comparability". The FCC should also utilize the granting of tax certificates as a regulatory incentive for voluntary negotiations.

Finally, in the few situations where voluntary negotiations fail to achieve a satisfactory result and mandatory relocation procedures must be invoked, UTC recommends the use of mediation as a first step in resolving points of disagreement. Mediation would permit the parties to craft an agreement tailored to their unique circumstances, and would eliminates the risk and uncertainty of an arbitrator reaching a decision that fails to meet the needs of either party.

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THIRD NOTICE OF PROPOSED RULE MAKING

Pursuant to Section 1.415 of the Commission's Rules, the Utilities Telecommunications Council (UTC) hereby submits its Comments on the Third Notice of Proposed Rule Making, FCC 92-437, released October 16, 1992 (Third NPRM), in the above-captioned proceeding. By the Third NPRM, the Commission has requested comment on some of the details necessary to implement the 2 GHz transition rules which were adopted in the simultaneously-released First Report and Order in this proceeding.

I. INTRODUCTION

UTC is the national representative on communications matters for the nation's electric, gas and water utilities. Many of UTC's member utilities are licensed to operate in the 1850-2200 MHz band for point-to-point microwave

communications, and would be directly affected by the mandatory relocation rules proposed in this proceeding. UTC has been an active participant at other phases of this proceeding, and welcomes the opportunity to address these remaining issues.

II. RULES ADOPTED IN THE FIRST REPORT AND ORDER

In the First Report and Order (First R&O), the Commission adopted a transition framework for the orderly migration of incumbent microwave systems from the 2 GHz band in order to facilitate the introduction of emerging telecommunications technologies. The rules, as adopted by the FCC, provide that: (1) incumbent licensees and new service licensees may negotiate voluntarily over the terms for relocating incumbent users to other bands or alternative media; and (2) after a specified period of time, a new service licensee may request mandatory relocation of a non-exempt incumbent microwave system, subject to certain conditions necessary to ensure that the incumbent licensee is made "whole," both operationally and financially.[1/] Among the conditions required for mandatory relocation are the following:

[1/] In the First R&O, the Commission provided an exemption from the mandatory relocation procedures for microwave systems licensed to public safety and special emergency radio services -- including state and local governments, police, fire, and medical emergency communications.

(1) The new service licensee guarantees payment of all relocation costs;

(2) The new service licensee is responsible for implementing the replacement facilities;

(3) The new service licensee is responsible for building and testing the replacement facilities;

(4) The incumbent licensee is not required to relocate until the "comparable alternative facilities" are available for a reasonable time to make adjustments and ensure a "seamless handoff;" and

(5) If, within one year, the incumbent licensee demonstrates that the new facilities are not comparable to the old facilities, the new service licensee is responsible for remedying the defects or relocating the incumbent to its former facilities.[2/]

III. RULES PROPOSED IN THE THIRD NOTICE OF PROPOSED RULEMAKING

In order to implement these transition rules, the Commission has requested comment on several of the details of the mandatory relocation procedures:

(1) How should the FCC define "comparable alternative facilities" in assessing the reasonableness of a new service licensee's relocation proposal?

[2/] First R&O, Appendix A ("Final Rules"), to be codified at 47 C.F.R. §94.59(b). Although these Rules are "final" and are scheduled to become effective on January 27, 1993, UTC has requested reconsideration and/or clarification of certain aspects of these final rules. The American Public Power Association (APPA) filed a similar petition for clarification with respect to the state/local government exemption. Apple Computer, Inc. (Apple) filed a petition for clarification or reconsideration of whether these rules are indeed "final." No other parties timely requested reconsideration or clarification of the First R&O.

(2) How should disputes between incumbents and new service licensees be handled?

(3) What period of time should be provided before parties could resort to the mandatory relocation procedures?

(4) How could tax certificates be used in this transition framework?

As explained below, UTC believes procedures can be adopted that will allow for the orderly relocation of incumbent microwave systems, while at the same time fulfilling the Commission's desire to rely on marketplace forces to achieve this result.

A. The FCC Should Encourage Private Negotiations

Throughout this proceeding, the Commission has stated its intention to rely on marketplace forces to provide for the introduction of new telecommunications services.[3/] This is consistent with the Commission's general policies on the development of new technologies and services, and is especially relevant in the present allocation proceeding where policies are being developed for the introduction of largely unknown, or as-yet undefined, radio services. Significant work remains to be done in identifying the services that will occupy the 2 GHz band, in examining the

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[3/] Notice of Proposed Rulemaking (NPRM) in ET Docket No. 92-9, 7 FCC Rcd 1542, 1545 (1992); Notice of Proposed Rulemaking (NPRM) in GEN. Docket No. 90-314, 7 FCC Rcd 5676, 5694 (1992).

spectrum-sharing potential of these services, and in developing operational rules and interference criteria.

Even though the Commission has proposed "Personal Communications Services" (PCS) as the first candidate for co-primary allocation to the 2 GHz band, many issues remain to be resolved in that proceeding.[4/] Moreover, the Commission has not yet commenced any proceedings concerning new service allocations for a significant portion of the 2 GHz "spectrum reserve" created in this proceeding; i.e., the 2110-2150 MHz and 2160-2200 MHz bands. It would be difficult (and perhaps unnecessary) for the Commission to develop precise rules on 2 GHz transition when there are so many variables that could arise as a result of actions in other allocation proceedings or as a result of marketplace developments.

At the same time, so many variables are involved in the design and operation of 2 GHz microwave systems that it would be unwise for the Commission to try to list, in advance, all the criteria by which replacement facilities should be evaluated for "comparability." Private microwave systems have been developed largely due to the fact that public communications services are incapable of, or

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[4/] See NPRM, GEN Docket No. 90-314, 7 FCC Rcd 5676 (1992).

inadequate in, meeting the users' unique operational requirements. Part 94 of the Commission's Rules provides significant flexibility to the user so that microwave systems can be developed to meet each user's special needs.

With over 30 years of licensing history and over 29,000 microwave systems licensed in the 2 GHz band, it would be an arduous task for the Commission to catalogue all the factors that microwave users consider important in the design and operation of their microwave systems. For example, one microwave licensee might consider "availability" to be the overriding concern; another might be more concerned with having adequate reserve capacity to meet peak loading or for future growth; and yet another licensee might consider the type of equipment to be important due to employee training or the availability of spare parts and test equipment.

UTC therefore urges the FCC not to define "comparable alternative facilities" by reference to any single, inflexible standard. Rather, the Commission should create a process that permits and encourages parties to negotiate privately and to identify the factors that each microwave licensee considers important to an assessment of "comparability." UTC believes that the transition rules it is proposing will foster this cooperative environment and

will minimize the need for any Commission involvement. More importantly, UTC's proposal will promote the development of emerging telecommunications technologies by affording new service licensees flexibility to relocate microwave systems to facilities that meet each user's needs, not the Commission's pre-defined notions of "comparability." Finally, the market-based plan suggested by UTC will bring this phase of Docket 92-9 to a close at the earliest possible date, and without the need for negotiated rulemaking.

B. Disputes Should Be Resolved By the Parties Through Mediation

1. Market Forces Will Encourage Negotiations

UTC believes that selection of a dispute-resolution mechanism for mandatory relocation should be guided by four principles: (1) the parties should be encouraged to resolve their own differences; (2) the need for Commission involvement should be minimized; (3) matters that could affect licensing policy or set administrative "precedents" should not be delegated to outside decision-makers; and (4) disputes should be handled promptly. UTC therefore believes that the controlled use of mediation would meet these objectives.

The transition rules adopted in the First R&O represent a deliberate compromise between the two

alternatives originally proposed by the Commission: (1) indefinite co-primary licensing of all 2 GHz microwave systems with purely voluntary negotiations between new service licensees and incumbents, or (2) limited co-primary status for incumbent microwave systems, with automatic reversion to secondary status after a fixed period of years. The plan adopted in the First R&O assures indefinite co-primary status for all 2 GHz microwave systems, subject only to the potential for fully-reimbursed mandatory relocation if a negotiated agreement cannot be reached. Thus, the transition rules are premised on voluntary negotiations, with mandatory relocation available as a "fail safe" measure in case of unreasonable holdouts by incumbent licensees. UTC believes that this transition framework will lead to successful relocations in the vast majority of cases with no need for dispute-resolution procedures.[5/]

As UTC's members and others have emphasized throughout this proceeding, private microwave facilities are a business "tool," and not a commercial "franchise." UTC understands that the proponents of commercial PCS systems value spectrum for its profit-making potential, and are

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[5/] As noted above, it is still unknown how many of the 29,000 microwave facilities in the 2 GHz band will be required to relocate to accommodate new technologies.

inclined to attribute the same motives to private microwave licensees. However, the evidence submitted in this proceeding has confirmed that microwave licensees will, in good faith, negotiate for reasonable offers to relocate to alternate facilities. In the Third NPRM, for example, the Commission noted that two private microwave licensees, Baltimore Gas and Electric and the City of San Diego, would be amenable to relocating in return for fair compensation.[6/] Likewise, Personal Communications Network Services of New York, Inc. (LOCATE) represented in its Comments in this docket that it had successfully negotiated with private microwave licensees for relocation to alternate facilities.[7/] Significantly, LOCATE was able to do this even before the Commission adopted relocation rules.

To the extent voluntary negotiations could lead to stone-walling or unreasonable demands for compensation, the mere availability of a mandatory relocation procedure will act as an incentive for incumbent licensees to negotiate in good faith. By granting a "self-help" remedy to new service licensees, the Commission has ensured that incumbent licensees' bargaining power will be restrained.

[6/] Third NPRM, para. 10 and n.14.

[7/] See Comments of LOCATE in ET Docket No. 92-9, filed June 8, 1992, pp. 15-19.

Even without the threat of mandatory relocation procedures, marketplace realities will limit any incumbent's ability to hold-out very long. History has shown that when a band is reallocated to a new service, any "grandfathered" licensees remaining in the band soon find themselves "orphaned" by equipment manufacturers, who no longer find it profitable to maintain production lines or spare parts for such a limited market.[8/] Thus, most licensees in the 2 GHz band would welcome the opportunity to discuss relocation so that continued operations will not be threatened by interference from the new technology systems, or "orphaned" due to the demise of the 2 GHz equipment market.[9/]

[8/] Harris Equipment-Farinon Division, a leading U.S. manufacturer of microwave equipment, indicates that it has been losing $1 million per month in 2 GHz sales due to the Commission's actions in creating a spectrum reserve. See Comments of Harris in ET Docket No. 92-9, filed June 8, 1992, p. 1.

[9/] Although the mandatory relocation procedures will not apply to state/local government licensees, these procedures will indirectly limit the "bargaining power" of exempt licensees. That is, systems operated by non-exempt licensees will probably be the first to be relocated from the band due to the ability of new service licensees to "threaten" invocation of the mandatory relocation procedures. With the exodus of non-exempt 2 GHz licensees, state/local government licensees will probably find only limited manufacturer support for their systems. UTC therefore suspects that "exempt" licensees will have every incentive to negotiate in good faith for relocation from the band.

2. Mediation is the Most Appropriate Technique for Resolving Disputes

In the few situations where mandatory relocation procedures must be invoked, UTC recommends that mediation be used as a first step in resolving points of disagreement.[10/] Mediation is particularly appropriate in disputes with extremely complex facts or legal issues; in disputes in which the parties' positions are divergent and a neutral party could expedite settlement; and in disputes in which communication between the parties has broken down.[11/] Mediation provides the parties with complete control over the process, with its aim at settlement, not further litigation. The American Arbitration Association (AAA) identifies the following as the most common benefits of mediation:

- Parties are directly engaged in negotiating the settlement.
- The mediator, as a neutral third party, can view the dispute objectively and can assist the parties in exploring alternatives that they might not have considered on their own.
- Because mediation can be scheduled early in the dispute, a settlement can be reached much more quickly than in litigation.
- Parties generally save money through reduced legal costs and less staff time.

[10/] Telocator, representing the interests of many, if not most of the PCS proponents, previously endorsed the use of mediation in resolving relocation issues. See Comments of Telocator in ET Docket No. 92-9, filed June 8, 1992, p. 8.

[11/] Kornblum, Guy O., "Voluntary Private Dispute Resolution: Compliment or Competitor to Courts?" 57 Defense Counsel Journal 370, 372 (1990).

- o Parties enhance the possibility of continuing a business relationship with each other.
- o Creative solutions or accommodations to special needs of the parties may become part of the settlement.[12/]

Mediation procedures are flexible, and are even more informal than those used in arbitration. In fact, mediation is recommended as an interim process during arbitration to encourage the parties to reach a mutually-agreeable settlement before referral to an arbitrator. Mediation permits the parties to craft an agreement tailored to their unique circumstances, and eliminates the risk and uncertainty of an arbitrator reaching a decision that fails to meet the needs of either party. Since arbitration awards are usually issued without written opinions or explanations, the parties (as well as the Commission) would have no way of knowing the basis for the arbitration award.

Even though arbitration is a form of alternative dispute resolution, it is similar to litigation in that it is adversarial in nature. Mediation, on the other hand, is designed to narrow the points of disagreement and to reach settlement on those points. Since most microwave licensees are also large consumers of telecommunications services,

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[12/] American Arbitration Association, "A Guide to Mediation for Business People," p. 5.

new service licensees are unlikely to want to engage in adversarial proceedings against some of their largest potential customers.[13/]

Depending on how channels are allocated and service territories are defined, microwave relocations may involve multiple parties. For example, multiple new service licensees "sharing" a channel may be required to jointly relocate a single microwave path, or a single new service licensee may need to relocate multiple microwave paths to free a single channel. Mediation would best accommodate multiparty situations since the interests of all parties can be reviewed dynamically and as part of a universal settlement. Even in arbitration or litigation, the parties on the "same side" of the issues must at some point negotiate among themselves as well as with the "other side." Mediation can bring all of the parties together and assist in coordinating these settlement negotiations.

In discussing alternative dispute resolution, it is important to remember that the Commission cannot be completely eliminated as an ultimate party to the

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[13/] Many private microwave licensees have extensive communications resources that could be used by new service licensees to expedite initiation of service. The opportunities for creative joint venturing could be lost if the parties are forced into adversarial positions due to relatively minor disagreements over microwave relocations.

proceedings. Any relocation decision that is reached by the parties, either voluntarily or through an arbitrator's award, will eventually involve the Commission due to the need to modify the license of the incumbent microwave licensee, the new service licensee, or both.

If adversarial procedures, such as arbitration, are used, the Commission is likely to be confronted with additional petitions and oppositions in connection with the new service licensee's request for involuntary modification of the incumbent's license. Section 316 of the Communications Act, 47 U.S.C. §316, prohibits involuntary modification of license absent an opportunity for administrative hearing. Thus, even though an outside arbitrator could determine the "reasonableness" of a proposed license modification, it is the Commission that must act on the request for license modification, and it is the Commission that must afford the opportunity for hearing should the licensee so demand. Therefore, UTC has serious questions as to whether arbitration would, in fact, reduce the Commission's burden. Mediation, on the other hand, would result in an agreement between the parties that would

ensure routine processing of any license modification applications.[14/]

C. All Incumbent Licensees and All New Service Licensees Should Be Subject to the Same Period for Voluntary Negotiations

1. "Transition Period" Includes Both Voluntary Negotiation Period and Mandatory Relocation Period

At paragraph 27 of the Third NPRM, the Commission requests comment on the length of the "transition period;" whether different "transition periods" should be adopted for different areas (e.g., urban versus rural) or due to technical considerations (e.g., length of links); and whether no transition period would be appropriate in some instances (e.g., in the case of unlicensed devices or services covered by blanket licenses). As explained below, the Commission has confused the issues in this docket by calling the voluntary negotiation period a "transition period."

[14/] Arbitration would also raise another interesting jurisdictional question: if an arbitrator were to reach a decision at odds with the new service licensee's position, and if the new service licensee refused to implement the modifications as directed by the arbitrator, to whom would the incumbent licensee look to enforce the arbitrator's award? Successful mediation, on the other hand, would result in a contract between the parties that could be enforced on a local forum, with no need for Commission intervention.

The First R&O created a transition framework that will remain effective so long as there are microwave systems operating in the 2 GHz band. The only timing issue that must be resolved is the period of time during which only voluntary negotiations would be permitted; that is, before a new service licensee could invoke mandatory relocation procedures. Thus, it is incorrect to call the voluntary negotiation period a "transition period" because the rules contemplate that negotiations may continue and microwave systems may transition from the band (voluntarily or involuntarily) long after the voluntary negotiation period "expires" and the mandatory relocation procedures become effective.

UTC's recommended transition plan, which was largely adopted by the Commission in the First R&O, provided only that there should be a period of marketplace negotiations before parties are permitted to invoke mandatory relocation procedures. By delaying the availability of mandatory relocation procedures, the Commission will encourage the parties to resolve differences voluntarily; it will stimulate the development of spectrum-sharing techniques; it will minimize the need for the Commission to intervene in what could be up to 29,000 relocation decisions; and it will allow the marketplace to establish fair compensation and reasonable relocation arrangements, which could serve

as a body of experience to be applied in contested cases. The goal is to let the marketplace resolve relocation issues, but to have a mandatory relocation program in place as a "safety net" to handle any situations where the incumbent refuses to deal in good faith.

2. The FCC Should Adopt a "Sliding" Period of Negotiations

UTC originally recommended a "negotiation period" of 10-15 years commencing from the adoption of rules in this docket. However, a more rational approach would be a "sliding period" of at least five (5) years, commencing with the date each new service license is granted in any particular area. That is, during the first five years of each new service license, the new service licensee would be permitted to negotiate with incumbent microwave licensees potentially affected by its system. Five years after license grant, the new service licensee could enter a voluntary agreement with incumbent microwave licensees or could invoke the mandatory relocation procedures.

By delaying the mandatory relocation procedures until after the first five years of each license term, all incumbent microwave users will have a reasonable period to discuss relocation before being subjected to a mandatory relocation program. Likewise, a "sliding period" will

ensure that all new service licensees are subject to the same obligation to attempt voluntary negotiations before invoking the Commission's procedures.

A delay of at least five years is appropriate since it will likely take a significant amount of time for each new service licensee to develop its system and to actually relocate incumbent microwave facilities. First, from what has been described so far in the PCS docket, GEN Docket No. 90-314, it will take a significant amount of time for PCS systems to be implemented even in the most promising markets. According to information presented by Arthur D. Little in connection with the Commission's en banc hearing on PCS, market demand for "New PCN" will not become significant until the 1998-2002 timeframe. Even by the year 2002, however, Arthur Little estimates that "New PCN"; i.e., independent personal communications networks using "new frequency allocations;" will have only 17.1 million subscribers, or slightly more than half the subscribers of analog and digital cellular systems (projected to have 30 million subscribers by 2002).[15/] Thus, it is important for the Commission to assess carefully any claims as to the projected growth in "personal communications services"

[15/] See written testimony of Arthur D. Little on the FCC's en banc hearing on PCS, GEN. Docket No. 90-314, filed December 5, 1991, pp. 14-17.

since these projections are often based on the full complement of wireless services available to consumers, and are not restricted to the "personal communications networks" proposed for the 1850-1990 MHz portion of the 2 GHz band.

The need to relocate microwave systems will also largely depend on the size of the spectrum blocks allocated to new service licensees. This issue is currently under consideration in Docket 90-314 in connection with allocations for PCS. Based on information submitted by many of the PCS proponents in that proceeding, it appears likely that significant PCS systems could be developed on vacant microwave spectrum without the need to relocate many, if any, incumbent microwave systems.[16/] It is simply unrealistic to believe that PCS licensees, or other new service licensees, will relocate all microwave paths in their respective markets immediately upon grant of their licenses.

[16/] See, e.g., Comments of Associated PCN Company, American Personal Communications, Omnipoint Communications, Pulson Communications, and Southwestern Bell in GEN Docket No. 90-314, filed November 9, 1992.

3. Estimated Time to Relocate

The Commission has also requested comment on the "estimated costs and time involved in any relocation action." As explained above, this issue is largely irrelevant in the context of the transition framework adopted in the First R&O. The so-called "transition period" is not the period during which all microwave systems will be expected to relocate: it is simply the period during which new service licensees will be permitted to negotiate for microwave relocation. Thus, if voluntary agreement can be reached during this period, it will be up to the parties to determine how long it will take to physically complete the cut-over to new facilities.

Although it is irrelevant to the amount of time that should be allowed for voluntary negotiations, a reasonable estimate of the time required to complete a simple microwave relocation is 15 months. Relocation of multiple paths would complicate the process and would take significantly longer. Appended hereto as "Attachment A" is a time line depicting the steps that would be involved in a routine microwave relocation. It should be noted that this is a fairly conservative estimate, since it assumes that the new microwave facilities will not require any major changes in the antenna structure, nor will any new transmitter sites be involved. If a new site must be

secured, together with all zoning, environmental and FAA approvals, the time could easily increase by 6-12 months, if not more. In a survey of UTC's members licensed in the 2 GHz band, the respondents indicated that, on average, it would take about 4 years for each licensee to relocate all of its facilities from the 2 GHz band, with some respondents indicating it could take as long as 15 or 20 years.[17/]

4. All Incumbent Microwave Users Need Same Voluntary Relocation Period

The Commission has proposed to make the mandatory relocation rules effective some period of years after the adoption of a Report and Order on the Further Notice of Proposed Rule Making in this docket on rechannelization of the microwave bands above 3 GHz. However, it appears that the issues in the FNPRM could be resolved long before the adoption of PCS rules. Moreover, 80 MHz of the "spectrum reserve" (2110-2150 MHz and 2160-2200 MHz) have not even been proposed for allocation to any radio services. Therefore, it would be arbitrary for the Commission to commence a "transition period" until it knows when and where new service licensees will require microwave spectrum so that all incumbents have the same opportunity, and all

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[17/] See UTC's Comments, filed October 1, 1990, in GEN Docket No. 90-314, at Appendix A.